

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

Keith Curtis and Tyneshia Brooks,)	
Individually and on Behalf of All Others)	
Similarly Situated,)	Civil Action No. 3:12-cv-02370-JFA
)	
Plaintiffs,)	
)	
vs.)	NOTICE OF MOTION AND
)	MOTION TO COMPEL
Time Warner Entertainment-Advance/)	DISCOVERY RESPONSES
Newhouse Partnership,)	
)	
Defendant.)	
_____)	

Plaintiffs Keith Curtis and Tyneshia Brooks hereby move pursuant to pursuant to Rules 26, 33 and 34, Fed. R. Civ. P. to compel full and complete discovery responses by Defendant of Plaintiffs' Interrogatories and Request for Production directed to Defendant and deem all improperly raised objections in Defendant's responses and supplemental responses waived.

The grounds for this motion are set forth in Plaintiffs' memorandum of law in support filed contemporaneously with this motion. Pursuant to Local Rule 7.02, the undersigned certify that they have consulted with opposing counsel prior to filing this motion.

Respectfully submitted by,

s/ Todd Ellis
 Todd Ellis (Fed. I.D. # 6488)
 LAW OFFICE OF TODD ELLIS, P.A.
 7911 Broad River Road, Suite 100
 Irmo, South Carolina 29063
 (803) 732-0123
 (803) 732-0124 FACSIMILE
 TODD@TODDELLISLAW.COM

Richard A. Harpootlian (Fed. I.D. #1730)
Graham L. Newman (Fed. I.D. #9746)
M. David Scott (Fed. I.D. #8000)
Christopher P. Kenney (Fed. I.D. #11314)
RICHARD A. HARPOOTLIAN, P.A.
1410 Laurel Street
Post Office Box 1040
Columbia, South Carolina 29202
(803) 252-4848
(803) 252-4810 (facsimile)
rah@harpootlianlaw.com
gln@harpootlianlaw.com
mds@harpootlianlaw.com
cpk@harpootlianlaw.com

James M. Griffin (Fed. I.D. #1053)
Margaret Fox, (Fed. I.D.# 10576)
Lewis Babcock & Griffin
Post Office Box 11208
Columbia, SC 29202
(803) 771-8000
(803) 733-3541 facsimile
jmg@lbglegal.com
mnf@lbglegal.com

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